

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

OPENAI, INC.,

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This Document Relates To:

No. 1:23-cv-11195 (SHS) (OTW)

25-md-3143 (SHS) (OTW)

PLAINTIFFS' MOTION TO SEAL

Under paragraph 22 of the Stipulated Protective Order in this case (*The New York Times* Dkt. 127), Plaintiffs The New York Times Company (“The Times”), Daily News, LP, et al. (“Daily News Plaintiffs”), and The Center for Investigative Reporting (“CIR”) (collectively the “News Plaintiffs”), respectfully seek to provisionally file under seal portions of Exhibit 1 attached to their Request for Permission to File Supplemental Letter to News Plaintiffs’ Motion to Compel OpenAI to Identify the Output Logs it Has Destroyed. *See* Dkts. [22](#) (the MDL docket) and [539](#) (*The Times* docket) (sealed version). Public redacted versions of Exhibit 1 and the attachments thereto have been filed as Dkts. [21](#) (the MDL docket) and [538](#) (*The Times* docket). Exhibit 1 includes a proposed supplemental letter requesting a conference to discuss a discovery dispute—specifically, News Plaintiffs’ request to compel OpenAI to identify the output logs it has destroyed since The Times filed its Original Complaint on December 27, 2023. News Plaintiffs seek to file portions of Exhibit 1 under seal because it discusses documents and information that OpenAI has designated as

Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22 (*The Times* docket). News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, OpenAI has five business days to file a statement of reasons for why the material should be sealed. *Id.* News Plaintiffs will review OpenAI's filings, and if necessary, confer about any disagreement.

Dated: May 7, 2025

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